

# **EXHIBIT A**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

DR. STELLA IMMANUEL,

*Plaintiff,*

v.

ANDERSON COOPER and CABLE  
NEWS NETWORK, INC.,

*Defendants.*

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CIVIL ACTION NO.  
4:21-CV-587

**DECLARATION OF DEMI WILLIAMS IN SUPPORT OF MOTION OF DEFENDANT  
CABLE NEWS NETWORK, INC.'S MOTION TO DISMISS FOR IMPROPER VENUE  
OR, IN THE ALTERNATIVE, MOTION TO TRANSFER**

I, Demi Williams, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am an attorney at the law firm of Jackson Walker LLP, attorneys for Defendant Cable News Network, Inc. (“CNN”) in the above-captioned matter.

2. I submit this declaration to annex CNN’s Motion to Dismiss for Improper Venue or, in the alternative, Motion to Transfer in this action.

3. On information and belief, and according to Google Maps, Rehoboth Medical Center is located at 6728 South Texas 6, Houston, Texas 77083; the relevant Eastern District of Texas, Sherman Division courthouse is located at 101 East Pecan Street, Sherman, Texas 75090; and the Southern District of Texas, Houston Division courthouse is located at 515 Rusk Avenue, Houston, Texas 77002. Also according to Google Maps, the driving distance between Rehoboth Medical Center and the Sherman Division courthouse is 318 miles, and the driving distance between Rehoboth Medical Center and the Houston Division courthouse is between 20.1 and 20.4 miles.

4. On information and belief, all documents related to the loss of income and impaired future earnings alleged by Plaintiff Dr. Stella Immanuel (“Dr. Immanuel”) are stored within the Southern

District of Texas, at or near Dr. Immanuel's medical practice at Rehoboth Medical Center in Houston.

5. On information and belief, all – or nearly all – witnesses from whom CNN and Dr. Immanuel would seek testimony regarding Dr. Immanuel's alleged reputational, mental, and financial harm are located in the Southern District of Texas, at or near Dr. Immanuel's medical practice.

6. To that end, CNN will seek testimony from Dr. Immanuel's current and former Rehoboth patients regarding (1) Dr. Immanuel's reputation before and after the alleged defamatory statements; (2) their reasons for leaving or remaining under Dr. Immanuel's medical care; (3) whether they ever read and/or saw the CNN articles and/or telecasts; (4) whether Dr. Immanuel's practice regarding masking and the treatment of COVID-19, as detailed in paragraphs 2 and 3 of the Complaint, are truthful; and (5) their perception of Dr. Immanuel's mental well-being before and after the alleged defamatory statements. Likewise, CNN will seek testimony from staff at Rehoboth regarding (1) Dr. Immanuel's reputation before and after the alleged defamatory statements ; (2) practice records, including financial records; (3) their perception of Dr. Immanuel's mental well-being before and after the alleged defamatory statements; and (4) the reputation, and financial success, of Dr. Immanuel practice before and after the alleged defamatory statements.

7. On information and belief, the cost of attendance for willing witnesses will increase substantially between the Eastern District and Southern District of Texas, with the Sherman Division courthouse sitting nearly 300 miles further away from the most-identifiable locus of events for purposes of residency – Rehoboth Medical Center.

8. On information and belief, Dr. Immanuel is member of the Fire Power Ministry community and, thus, holds some reputation – good or bad – therein.

9. On information and belief, all – or nearly all – witnesses from whom CNN and Dr. Immanuel would seek testimony regarding Dr. Immanuel’s ministry and any alleged reputational harm within the Fire Power Ministry community are located in the Southern District of Texas, at or near Fire Power Ministry.

10. Annexed hereto as **Exhibit A-1** is a true and correct copy of the currently-available Google Street View of Fire Power Ministry at 25231 Roesner Lane, Katy, Texas 77494.

11. From Fire Power Ministry, CNN will seek testimony about (1) the content of Dr. Immanuel’s preaching at the Fire Power Ministry as set forth in paragraphs 6 and 9 of the Complaint; (2) Dr. Immanuel’s reputation before and after the broadcasts; and (3) whether any members of her ministry even read and/or saw the CNN articles and/or telecasts.

12. CNN does not currently anticipate calling any witnesses within the subpoena power of the Eastern District of Texas, Sherman Division.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 17, 2021 in Dallas, Texas.

/s/ Demi Williams

Demi Williams